



R.T. Vanderbilt Company, Inc.

INDUSTRIAL MINERALS AND CHEMICALS

30 WINFIELD STREET, P.O. BOX 5150, NORWALK, CONNECTICUT 06856-5150
(203) 853-1400 Fax (203) 853-1452 • Internet Address: www.rtvanderbilt.com

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To Members of the Commerce Committee:

R. T. Vanderbilt Company, Inc. is a small specialty chemical and mineral manufacturer and distributor. We employ approximately 200 people in Connecticut. We have a wastewater pretreatment discharge permit and are subject to several general permits in the water program. We are currently using the Water Quality Standards (WQS) as a basis for remediation decisions.

The state's Water Quality Standards (WQS) form the foundation for virtually all of DEP's water permitting and remediation programs. Current law requires periodic updating of the WQS but provides no state governmental process outside of DEP itself. DEP is currently proposing over 500 new or modified numeric standards. Some of these standards will have a substantial impact on all manufacturing as well as many other businesses and economic development projects in Connecticut. Yet, DEP has complete control over the adoption of these new standards with no opportunity for administrative appeal or legislative review (through the Regulations Review Committee).

The potential impact of these standards is too significant, economically and otherwise, to limit the adoption/revision process solely to the DEP.

Please support SB-174.

Thank you for this opportunity to comment.

Sincerely,

Donna Duessel
Corporate Environmental Manager
R. T. Vanderbilt Company, Inc.



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